



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 10**  
1200 Sixth Avenue  
Seattle, Washington 98101

June 7, 2002

Reply To  
Attn Of: ECL-113

Commander, Ft. Lewis  
Directorate of Public Works  
ATTN: AFZH-DEQ MS 17 (Mr. Eric Waehling)  
Building 2012, Room 323  
Ft. Lewis, WA 98433-9500

*(sent via e-mail and regular mail)*

Subject: *BRAC HTRW Closure Report for Drum Disposal Area, Paint and Solvent Disposal Area, Washracks 1 and 2, Maintenance Pit, Pesticide Mixing/Storage Building (Bldg. 1846), Aboveground storage tanks, CS Gas Training Area, Pesticide Storage Building (Bldg. 4126), and Ammunition Storage Bunkers (#2953, #2951, #2950), prepared by URS, for the US Army Corp of Engineers, and dated May 2002.*

Dear Eric:

Please find EPA's comments on the subject closure report enclosed. Let me know if you have any questions or concerns at (206) 553-1220.

Sincerely,

Sean Sheldrake, Project Manager

Enclosure

cc: Rodney Taie, USACE  
Chris Maurer, Ecology

*via-email only*  
“”

Enclosure: Review of the *BRAC HTRW Closure Report for Drum Disposal Area, Paint and Solvent Disposal Area, Washracks 1 and 2, Maintenance Pit, Pesticide Mixing/Storage Building (Bldg. 1846), Aboveground storage tanks, CS Gas Training Area, Pesticide Storage Building (Bldg. 4126), and Ammunition Storage Bunkers (#2953, #2951, #2950)*, prepared by URS, for the US Army Corp of Engineers, and dated May 2002.

**Section 1.1, Page 1-1, First Paragraph.** The text states that the Site Closure Report "...does not include the UXO component of the sites." The entire installation, however, was according to last sentence of the third paragraph in the Executive Summary "... qualified for unexploded ordnance (UXO) and/or ordnance fragments." and according to the last sentence of the sixth paragraph of the Executive Summary "...UXO construction support was provided to ensure a safe working environment." UXO was, according to these last two statements an issue in investigating the sites proposed for closure and therefore, in the opinion of Gannett Fleming, UXO should be included and discussed as part of the Site Closure Report. If the issue of UXO at these sites was addressed previously in another document then that document should be referred to in the text and the findings included in the Site Closure Report. (JR)

**Section 3.2.2, Page 3-3, Site Background, First Paragraph.** The discussion of background sample locations includes the statement that "Two locations (BK-SS01 and BK-SS02) were selected near Lacamas Creek, close to the point where it exits the site to the West." These two locations near the western border of the site are downgradient of the entire watershed Camp Bonneville is located in and are not appropriate for inclusion in the data used to establish site background or site screening criteria. These locations are subject to potential contamination transported downgradient by Lacamas Creek from any and all upland locations. (JR)

The text states that these locations were selected "to evaluate the chemical composition of the flood plain soils." According to the analytical data presented in Table 3-2, however, many analytes such as Arsenic, Barium, Cadmium, Chromium and Copper for instance are reported at higher concentrations for the samples collected at these locations than the concentrations reported at most of the other background locations throughout the site. The effect of the data collected at these two locations may bias the statistical concentrations to higher levels than actually are representative of background conditions at the site.

In addition, in the opinion of Gannett Fleming, it would be helpful for review to include a rational for many of the background locations located in the western portion of the Camp Bonneville site as shown in Figure 3-2.

**Section 3.3.2.1, Page 3-8, Last Paragraph.** The text states that in Area G, 92 tons of soil and approximately 66 cubic yards of debris was removed from this area. The text also states that only one confirmation sample was collected from the bottom of the excavated area. In the opinion of Gannett Fleming, the collection of one confirmation sample from the bottom of the pit is minimal. Please justify the collection of one confirmation sample from the bottom of the excavated area in the text. (AP)

**Table 3-10.** According to this table the above ground storage tank area was only analyzed for petroleum hydrocarbons. Due to the likely inclusion of lead in the petroleum stored at the site, it is probable the lead is also a potential contaminant at this site. Please indicate in the text why lead was not analyzed for at this site. (AP)

**Table 3-11.** The table has 2,4-DNT and 2,6-DNT highlighted, however, the table does not indicate what regulatory or risk based criteria these data results are being compared to. Please clarify the table. (AP)

**Table 3-13.** Please define the qualifier “D” used in this table, as it is not defined in either Table 3-13 or the referenced Table 3-4. (AP)

